

ARCHER & GREINER
A Professional Corporation
One Centennial Square
P.O. Box 3000
Haddonfield, NJ 08033-0968
(856) 795-2121
Attorneys for Defendant, Air Line Pilots Association International

BY: STEVEN J. FRAM, ESQUIRE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,

Plaintiffs,

V.

Civil Action No. 02-2917 (JEI)

AIR LINE PILOTS ASSOCIATION,
INTERNATIONAL,

Defendant.

**NOTICE OF MOTION OF DEFENDANT TO REVOKE THE *PRO HAC VICE*
ADMISSION OF CERTAIN COUNSEL FOR PLAINTIFFS**

To: Lisa J. Rodriguez, Esquire
Trujillo Rodriguez & Richards, LLC
258 Kings Highway E.
Haddonfield, NJ 08033

Allen Press, Esquire
Green Jacobson & Butsch, P.C.
7733 Forsyth Boulevard
Suite 700
St. Louis, MO 63105

PLEASE TAKE NOTICE that on Tuesday, September 6, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant, the Air Line Pilots

Association International, shall move before the United States District Court for the District of New Jersey, at the U. S. Courthouse and Post Office Building in Camden, New Jersey, for an Order to revoke the *pro hac vice* admission of Allen Press, Esquire and Joseph Jacobson, Esquire as counsel for Plaintiffs in this case.

In support of this motion, the undersigned shall rely upon the brief being submitted with this Notice of Motion, the accompanying Declaration of Counsel and the record herein. A proposed form of Order is also being submitted.

Oral argument is requested.

Respectfully submitted,

ARCHER & GREINER
A Professional Corporation

By: /s/ Steven J. Fram
STEVEN J. FRAM, ESQUIRE

Pro Hac Vice:

Daniel M. Katz, Esquire
Katz & Ranzman, P.C.
1015 18th Street, N.W., Suite 801
Washington, DC 20036
(202) 659-4656
Counsel for Defendant, Air Line Pilots Association

Dated: August 10, 2011.

7010743v1